

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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95-TEP-267

Ms. Mary H. Thompson
State Historic Preservation Officer
Dffice of Archaeology and Historic Preservation
Washington Department of Community,
Trade and Economic Development
P.O. Box 48343
Dlymp1a, Washington 98504-8343



Dear Ms. Thompson:

EXEMPTION FROM HISTORIC PROPERTIES INVENTORY FORM (HPIF) DOCUMENTATION REQUIREMENT

Under the provisions of Section 110 of NHPA, the U.S. Department of Energy, Richland Operations Office (RL) is required to establish a "preservation program for the identification, evaluation, nomination...and protection of historic properties" under its jurisdiction or control. In implementing this section, RL continues to survey and inventory all historic buildings on site. This agency recognizes that the minimal acceptable documentation required for identification is an HPIF approved by the Washington State Historic Preservation Offica (SHPO). RL wishes, however, to request an exemption from the recording requirement for a number of property types on the Hanford Site. RL finds that these buildings and structures, are not eligible for inclusion in the National Register of Historic Places due to the minor role they played at the Hanford Site. The properties are not significant and do not meet any of the criteria for aligibility to the Register.

The purpose for this request is to divert resources away from the documentation of insignificant buildings and structures, so that efforts can be focused on more important and significant identification and evaluation activities at the Hanford Site. The exemptions requested are as follows:

- Mobile Trailers Temporary office space used by staff in support of the cleanup mission. These trailers may be moved to new locations at any time.
- Modular Buildings and Enclosures These structures are composed of premanufactured sides and roofs, boilted steel and are commonly resting on a poured concrete slab, or directly on the ground. They serve as temporary office, lab, protective, or storage facilities. Most have been

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brought on site within the last decade; some are commonly referred to as "Butler Buildings". Some older examples of "prefab" buildings exist which may have been placed on site within the last 25 years.

- 3. Structures with Minimal or No Visible Surface Manifestations The majority of earthen and concrete-lined Cribs, Trenches, French Drains, Chemical Storage Tanks, and other structures utilized in liquid waste management have been stabilized under a clean fill of cobbles. Solid Waste Burial Grounds have also been stabilized and covered over. No visible remnants of these structures remain. Most are radiologically contaminated, or contaminated by hazardous waste, or both. Likewise, underground tanks, vaults, and caissons holding liquid wastes are evidenced by little if any surface structure other than an access port. This situation is also repeated for underground pipelines, sewerlines, etc. where the only visible surface manifestation is a concrete slab containing a manhole cover or access port.
- 4. Storage Tanks Fuels ranging from gasoline to diesel to propane, used in deally operations of the plants, were stored in large aboveground tanks which rested on concrete slabs or were elevated on scaffolds. Some areas were surrounded by concrete "retainer walls" to manage spills. Other fuels were stored in underground tanks. This will also include water storage tanks.
- 5. Wells and Bore Holes There are thousands of these features on the Hanford Site. This will include Resource Conservation and Recovery Act Monitoring Wells, Drinking Water Wells, Abandoned Wells, Dry Wells, Test Wells, Site Characterization Wells, Recovery Wells, and bore holes.
- 6. Towers There are many power line towers on the site used to transfer power on and off site. This would also include Microwave towers.

As discussed in our April 25, 1995, meeting in Olympia, RL will provide you with at least one representative example of each exemption being requested. These structures, and their role in Hanford's history, will be described in a summary document which will be prepared following the initial evaluation of all non-exempt buildings and structures on site. This document will present the methodology utilized in arriving at our National Register eligibility determinations. If you find these exemptions acceptable, I will include them in the draft Programmatic Agreement.

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Your signature below will acknowledge receipt of our request. If you have any questions, or are in need of additional information, I may be contacted at (509) 372-2299.

Sincerely.

Dee W. Lloyd. Manager Cultural Resources Program

Environmental Assurance, Permits, and Policy Division

Office of Archaeology and Historic Preservation

CCI

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